

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

In Re:

KEITH KERR,

Case No. 10-72939-TJT

Chapter 13

Hon. TUCKER

Debtor(s)


OBJECTIONS TO CONFIRMATION

NOW COMES Creditor, CP FEDERAL CREDIT UNION, by and through counsel, BUTLER, BUTLER & ROWSE-OBERLE, P.L.L.C., and objects to the confirmation of the Debtor's proposed Chapter 13 Plan as follows:

1. Creditor is the holder of a perfected security interest in a 2008 Harley Davidson, VIN. 1HD1GM4198K335461.
2. The balance owing Creditor as of the date of the bankruptcy petition was \$8,414.16.
3. Creditor objects to the Debtors' proposed Plan as Creditor is not adequately protected.
4. Creditor requested documentation of full coverage insurance at the §341 Hearing and Debtors did not have valid proof.
5. The Debtor's Chapter 13 Plan proposes payment to Creditor direct from the Debtor.
6. Debtor proposes direct payment however, Schedule J does not include the payment.

WHEREFORE, Creditor prays that this Honorable Court will deny confirmation as proposed.

BUTLER, BUTLER & ROWSE-OBERLE, P.L.L.C.

 KAREN L. ROWSE-OBERLE (P-41893)  
Attorney for Creditor  
24525 Harper Avenue, Suite Two  
St. Clair Shores, MI 48080  
(586) 777-0770  
krowse-oberle@butler-butler.com

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